

October 20, 2020

VIA ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 4770 – Electric Earnings Sharing Mechanism
Earnings Report - Twelve Months Ended December 31, 2019
Responses to PUC Data Request – Set 3**

Dear Ms. Massaro:

On behalf of National Grid,¹ I have enclosed an electronic version of the Company's responses to the Public Utilities Commission's Third Set of Data Requests in the above-referenced matter.²

In this transmittal, the Company is providing its responses to PUC 3-14 and 3-16.

The Company's responses to 3-18 and 3-20 are pending.

Thank you for your attention to this transmittal. If you have any questions regarding this filing, please contact me at 401-784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosure

cc: Docket 4770 Service List
John Bell, Division
Christy Hetherington, Esq.
Leo Wold, Esq.

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

² Per Commission counsel's update on October 2, 2020, concerning the COVID-19 emergency period, the Company is submitting an electronic version of this filing. The Company will provide the Commission Clerk with five (5) hard copies and, if needed, additional hard copies of the enclosures upon request.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4770
In Re: Electric and Gas Earnings Reports
Twelve Months Ended December 31, 2019
Responses to Commission's Third Set of Data Requests
Issued on September 22, 2020

PUC 3-14

Request:

Does the Company have any transmission assets that do not technically meet the Company's asset classification rules based on voltage to be classified as transmission facilities, but are nevertheless classified as transmission? If so, please identify the facilities with a list and provide an explanation of why they were classified as transmission.

Response:

Yes, please see Attachment PUC 3-15-2 for a list of transmission assets that are below the voltage level ordinarily used for a transmission classification, but were nevertheless treated as transmission facilities in the revenue requirement.

Please see the Company's responses to PUC 3-10 and PUC 3-16 for an explanation of why these facilities were classified as transmission and why it would not be appropriate to include these assets in the transmission revenue requirement for purposes of the BITS surcharge.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4770
In Re: Electric and Gas Earnings Reports
Twelve Months Ended December 31, 2019
Responses to Commission's Third Set of Data Requests
Issued on September 22, 2020

PUC 3-16

Request:

Does New England Power Company own any facilities in any state that has voltage of 34.5 kV which are treated as a transmission facilities for purposes of calculating the revenue requirement under NEP's Electric Tariff No. 1? If so, please identify.

Response:

Yes, New England Power Company does own facilities in other states with a voltage of 34.5kV or less that are treated as transmission facilities in the calculation of the transmission revenue requirement. Please see Attachment PUC 3-15-2 for a list of such facilities that meet this criterion; however, these assets are not subject to TSA-NEP-83 or TSA-NEP-86, which defines the BITS surcharge. TSA-NEP-83 and TSA-NEP-86 are the tariffs by which the BITS assets are included in the calculation of the transmission revenue requirement in the BITS surcharge. Absent such tariff language applicable to similar assets in another state, it would not be appropriate to include those other assets in the transmission revenue requirement.

Furthermore, as referenced in PUC 3-10, classification of these assets is governed, in part, by historic asset classification of the applicable legacy company and a determination of majority share of investment for shared transmission and distribution substations.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.



Joanne M. Scanlon

October 20, 2020
Date

**National Grid Docket No. 4770 (Rate Application) & Docket No. 4780 (PST)
Combined Service list updated 8/12/2020**

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